

REMARKS

The present Amendment is in response to the Office Action mailed February 24, 2005. Claims 1, 2, 4, 7, 10, and 13-14 are amended, and claims 17-28 are withdrawn. Claims 1-16 are now pending in view of the above amendments.

Please note that the following remarks are not intended to be an exhaustive enumeration of the distinctions between any cited references and the claimed invention. Rather, the distinctions identified and discussed below are presented solely by way of example to illustrate some of the differences between the claimed invention and the cited references. In addition, Applicants request that the Examiner carefully review any references discussed below to ensure that Applicants understanding and discussion of the references, if any, is consistent with the Examiner's understanding. Reconsideration of the application is respectfully requested in view of the above amendments to the claims and the following remarks. For the Examiner's convenience and reference, Applicant's remarks are presented in the order in which the corresponding issues were raised in the Office Action.

II. PRIOR ART REJECTIONS

A. Rejection Under 35 U.S.C. §§ 102 and 103

The Office Action rejected claims 1-16 under 35 U.S.C. § 102(b) as being anticipated by *Duignan* (International Publication No: WO 00/72224 A1). In the alternative, the Office Action rejected claims 1-16 under 35 U.S.C. § 103(a) as being obvious over by *Duignan*. The Office Action rejected claims 1 through 11 under 35 U.S.C. § 102(b) as being anticipated by *Opower* (United States Patent No: 5,725,914) or, in the alternative, under 35 U.S.C. § 103 as being obvious over *Opower*. The Office Action rejected claims 2 and 10-16 under 35 U.S.C. § 103(a) as being unpatentable over *Duignan* in view of *Duignan*.

The independent claims rejected by the Office Action (claims 1 and 7) are both directed to a system for deposition of a material onto a substrate. Claim 1 has been amended to require that the target include a target material formed on a target substrate and that the target substrate has a matrix configuration. Claim 7 has been similarly amended to require that the target have a web with a matrix configuration coupled with a target material.

As noted in the specification, a matrix configuration increases the flexibility of the target substrate (or web) compared with target substrates (or webs) that have a continuous substrate. Further, such a target substrate can be fabricated from materials that are not transparent to the laser beam emitted by the laser source. Also, a target substrate or a web with a matrix configuration eliminates the possibility of vaporized target substrate contaminating other portions of the target substrate or from contaminating portions of the target material that is included in the target.

The target substrates or webs taught by *Duignan* and *Opower* are continuous and do not have a matrix configuration. *Duignan* teaches that the "material carrier element includes a tape backing element 53 which is a thin flexible material carrying a deposition layer of depositable material". See page 29, lines 8-11. Figure 7 of *Duignan* illustrates a continuous target substrate as well. Further, while *Duignan* discloses "tracks of different depositable materials" (See page 28, lines 8-10 and Figure 7 of *Duignan*), *Duignan* fails to disclose a target having a target substrate with a matrix configuration as required by claim 1 or a target comprising a web having a matrix configuration as required by claim 7. Similarly, *Opower* discloses that the "thin-layer target" can be a "thin-layer target foil" or "a film arranged on a carrier irradiatable with the laser beam." See col. 3, lines 40-46. A film arranged on a carrier irradiatable with the laser beam does not teach a target substrate or web comprising a matrix configuration as required by claims 1 and 7, respectively. In addition, the carrier 126 illustrated in Figure 4 of *Opower* illustrates a continuous carrier for the target material.

For at least these reasons, Claims 1 and 7 are not anticipated, taught, or suggested by *Duignan* or *Opower* either alone or in combination. Claims 2-6 and claims 8-16 depend from one of claims 1 and 7 and overcome the cited art for at least the same reasons.

CONCLUSION

In view of the foregoing, Applicants believe the claims as amended are in allowable form. In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, or which may be overcome by an Examiner's Amendment, the Examiner is requested to contact the undersigned attorney.

Application No. 10/757,032
Amendment "A" dated June 24, 2005
Reply to Office Action mailed February 24, 2005

Dated this 24th day of June 2005.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Carl T. Reed". The signature is fluid and cursive, with the first name "Carl" being more prominent.

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